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Attorneys for Debtor and Debtor-in-Possession  
Robin Elaine Mowbray

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**

In re  
ROBIN ELAINE MOWBRAY,  
Debtor.

Case No. 8:25-bk-10543-TA  
Chapter 11

**CHAPTER 11 STATUS REPORT**

**Status Conference:**

**Date:** April 22, 2025

**Time:** 11:00 a.m.

**Ctrm:** 5B 411

West Fourth Street,  
Santa Ana, CA 92701

**TO THE HONORABLE THEODOR C. ALBERT, UNITED STATES  
BANKRUPTCY JUDGE:**

Robin Elaine Mowbray, the debtor and debtor-in-possession in the above-captioned Chapter  
11 case (the “Debtor”), hereby submits this chapter 11 status report.

**I. BACKGROUND**

**A. The Debtor’s Business and Principal Assets and Liabilities**

The Debtor is the 100% owner of The Original Mowbray’s Tree Service, Inc (“MTS”) a

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debtor in case no.8:24-bk-12674-TA, and the managing member of Waterman Mowbray Property, LLC (“Waterman”), a debtor in case no. 8:25-bk-10542-TA. The Debtor co-owns a home in Yucaipa with her brother, who is responsible for the associated costs. The Debtor lives with her two children and father in Redlands, in a home she rents from the Gloria Mowbray Separate Property Trust (“Trust”), a special needs trust of which she is the Trustee, and her father, John Mowbray is the beneficiary. The Debtor provides management services to Waterman on a contractual basis and is an employee of MTS. The Debtor loaned MTS approximately \$5.8 million of her tax refunds when MTS began encountering financial challenges.

The Debtor’s largest creditors are the Trust, PNC Bank (“PNC”) and Bank of the Sierra (“BOTS”). The Trust is a secured creditor of the Debtor pursuant to a loan for the purchase of MTS stock secured by the stock itself. The Debtor personally guaranteed a loan from PNC to MTS for approximately \$7 million, and a loan from BOTS to Waterman for approximately \$2.6 million. The remainder of the Debtor’s unsecured debt is mainly credit card debt.

#### **B. Events Leading to this Case**

The Debtor, along with MTS and Waterman, are defendants in litigation brought by Ronnie Jordan. Ronnie Jordan was the prior chief executive officer of MTS and in addition to seeking damages against MTS, is also seeking damages against the Debtor personally and Waterman, claiming to have also been employed by Waterman.

The Debtor has made significant loans to MTS in order to help it navigate certain economic hurdles MTS faced as a result of the PG&E bankruptcy and the loss of a potential contract with Southern California Edison. As a result, the Debtor has recently struggled to cover her living expenses and is incurring mounting credit card debt.

The Debtor was compelled to file the above-captioned chapter 11 case (the “Case”) to protect the value of her estate for all stakeholders, while restructuring her legitimate obligations in an orderly, fair and equitable manner.

#### **II. COMPLIANCE WITH STATUTORY REQUIREMENTS**

The Debtor is in compliance with all of her duties under 11 U.S.C. §§ 521, 1106 and 1107. The Debtor timely filed her schedules and statement of financial affairs on March 5, 2025. [Dkt No.

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20]. The Debtor’s 341(a) meeting of creditors began on March 27, 2025, and was continued to May 22, 2025. [Dkt No. 35].

The Debtor provided the initial 7-day package documents required by the Office of the United States Trustee (“OUST”) on March 10, 2025, and continues to work closely with the OUST to provide copies of the remaining requested documents. The Debtor timely filed her first monthly operating report. [Dkt No. 30]. The Debtor’s quarterly OUST fees are not yet due. On April 8, 2025, the Debtor filed her periodic report on related entities regarding value, operations and profitability of entities in which the estate holds a substantial or controlling interest. [Dkt No. 38].

### **III. 13-WEEK CASH FLOW**

Through April 4, 2025, the Debtor’s operating cash flow and cash on hand were moderately better than the amounts projected in her 13-Week Cash Flow, a copy of which is attached hereto as Exhibit 1. The Debtor’s cash on hand was approximately \$19,411 versus the forecasted amount of \$12,061, mainly due to bankruptcy legal fees which are budgeted for but not being paid at this time. The Debtor does not anticipate any significant changes to her operating cash flow and cash on hand.

### **IV. RETAINED PROFESSIONALS**

On March 13, 2025, the Debtor filed her application to employ Elkins Kalt Weintraub Reuben Gartside LLP as General Bankruptcy Counsel (the “Elkins App.”). [Dkt No. 27]. On April 8, 2025, the Court entered an order approving the Elkins App. [Dkt No. 39].

### **V. UNEXPIRED LEASES AND CONTRACTS**

The Debtor intends to assume her residential lease for her home in Redlands, and her management agreement with Waterman in connection with the confirmation of her plan of reorganization.

### **VI. PROPOSED DEADLINES**

#### **A. Disclosure Statement and Plan**

The Debtor has been focused on the initial stages of this Case and completing the various reporting requirements. The Debtor intends to work closely with Waterman to formulate her plan which will likely entail Waterman liquidating certain real property assets. She will also work closely with MTS, in negotiating with PNC Bank regarding its plan treatment. The plan will also provide

1 for the pro-rata payment on allowed unsecured claims in the order and priority prescribed by the  
2 Bankruptcy Code. The negotiations with PNC Bank are likely to inform the timing of proposing and  
3 confirming a plan of reorganization. The Debtor also hopes that she will be able to reach a  
4 consensual resolution with Ronnie Jordan. However, if that does not occur, the Debtor has a strong  
5 basis on which to object to Ronnie Jordan's claim and will likely pursue litigation as necessary.

6 Currently, the Debtor's exclusive period to file a disclosure statement and plan of  
7 reorganization ends on June 19, 2025, and the Debtor hopes to file the disclosure statement and plan  
8 by that date. However, the Debtor reserves the right to seek an extension of her exclusivity periods.  
9 The Debtor requests that the Court not set a deadline to file a plan and disclosure statement.

10 **B. Proposed Claims Bar Date**

11 The Debtor requests that the Court establish a deadline to file claims pursuant to Federal  
12 Rule of Bankruptcy Procedure 3003(c)(3) and the Debtor proposes a deadline of 60 days from notice  
13 to be provided by the Debtor after the status conference. The Debtor requests that the Court not yet  
14 set a deadline for objections to claims at this time.

15  
16 DATED: April 9, 2025

ELKINS KALT WEINTRAUB REUBEN  
GARTSIDE LLP

17  
18  
19 By: 

ROYE ZUR

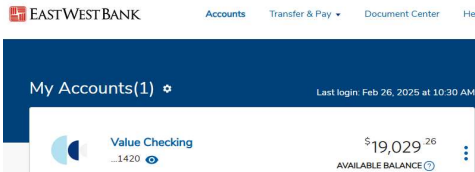
LAUREN GANS

Attorneys for Debtor and Debtor-in-Possession  
Mowbray Waterman Property, LLC

# EXHIBIT 1

Robin Mowbray  
26-Week Cash Projection

26-Week Cash Projection			0		1		2																											
			FORECAST		FORECAST		FORECAST		FORECAST		FORECAST		FORECAST		FORECAST		FORECAST		FORECAST		FORECAST													
			1		2		3		4		5		6		7		8		9		10		11		12		13							
			2/19/2025		2/21/2025		2/28/2025		3/7/2025		3/14/2025		3/21/2025		3/28/2025		4/4/2025		4/11/2025		4/18/2025		4/25/2025		5/2/2025		5/9/2025		5/16/2025		5/23/2025		5/30/2025	
									0																									
Cash on Hand - BOW			\$	20,260	\$	18,353	\$	19,029		19,029	\$	20,029	\$	13,362	\$	12,505	\$	11,908	\$	12,061	\$	9,894	\$	10,048	\$	8,441	\$	8,594	\$	13,927	\$	9,080	\$	9,231
Cash on Hand			\$		1,000		\$		847		\$		847																					
Sources of Cash																																		
Sales																																		
MTS Payroll Income					1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586			
MWPLLC Managent Fee									1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586		1,586			
Other Income																																		
Total Sources of Cash			-		1,586		1,586		1,586		1,586		1,586		1,586		1,586		9,586		1,586		1,586		1,586		9,586		1,586		1,586		1,586	
Uses of Cash																																		
Housing Costs																																		
Mortgage or Rent					900		900		900		900		900		900		900		900		900		900		900		900		901		902			
Home Insurance																																		
Water and Sewer											600				600										600									
Southern California Edison											1,200				1,200										1,200									
SoCalGas											200				200										200									
Home Maintenance													750				750																	
Pool Service											250				250										250									
Landscaping											500				500										500									
Total Housing Costs			-		900		900		900		3,650		900		1,650		900		3,650		900		1,650		900		3,650		900		901		902	
Food and Household Expenses																																		
Food and Housekeeping Supplies			787		88		583		380		380		380		380		380		380		380		380		380		380		380		381		382	
Household Supplies																																		
Total Food and Household Expenses			787		88		583		380		380		380		380		380		380		380		380		380		380		380		381		382	
Personal Expenses & Debt																																		
Credit Card Payments																																		
Medical Debt					-						-						-																	
Bank Charges							-																											
Clothing																																		
Personal Care											760						760																	
Entertainment			70		40		103		103		103		103		103		103		103		103		103		103		103		103		103			
Medical and Dental Expenses											250						250																	
Life Insurance									70						70										70									
Charitable Donations			50						50		50		50		50		50		50		50		50		50		50		50		50			
Legal CKB Vienna																											1,000				50			
Legal Elkins Kalt Weintraub Reuben Gartside LLP									4,000						4,000										4,000									
CPA Soren McAdam															3,500																			
Other (Bank Expenses)					35						-						-																	
Total Personal Expenses & Debt			120		75		103		153		4,223		1,163		153		153		7,723		153		1,163		153		223		5,153		153		153	
Total Uses of Cash			907		1,063		1,586		1,433		8,253		2,443		2,183		1,433		11,753		1,433		3,193		1,433		4,253		6,433		1,435		1,437	
Net Cash Inflow (Outflow)			(907)		523		0		153		(6,667)		(857)		(597)		153		(2,167)		153		(1,607)		153		5,333		(4,847)		151		149	
Cash on Hand - EOW			\$	19,353	\$	19,876	\$	19,876	\$	20,029	\$	13,362	\$	12,505	\$	11,908	\$	12,061	\$	9,894	\$	10,048	\$	8,441	\$	8,594	\$	13,927	\$	9,080	\$	9,231	\$	9,380



## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
10345 W. Olympic Blvd., Los Angeles, California 90064

A true and correct copy of the foregoing document entitled (*specify*): **CHAPTER 11 STATUS REPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) April 9, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) April 9, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) April 9, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Theodor C. Albert, Chief Judge  
Ronald Reagan Federal Building and Courthouse  
411 West Fourth Street, Suite 5085 / Courtroom 5B  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 9, 2025  
*Date*

Lauren B. Wageman  
*Printed Name*

/s/ Lauren B. Wageman  
*Signature*

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **Kenneth J Catanzarite** kcatanzarite@catanzarite.com
- **Lauren N Gans** lgans@elkinskalt.com, TParizad@elkinskalt.com
- **Jessica L Giannetta** jessica@giannettaenrico.com, melanie@giannettaenrico.com
- **Queenie K Ng** queenie.k.ng@usdoj.gov
- **Todd C. Ringstad** becky@ringstadlaw.com, arlene@ringstadlaw.com
- **Ahren A Tiller** ahren.tiller@blc-sd.com, 4436097420@filings.docketbird.com; brett.bodie@blc-sd.com; anika@blc-sd.com; derek@blc-sd.com; kreyes@blc-sd.com; megan@blc-sd.com; nicole@blc-sd.com; danny@blc-sd.com; angie@blc-sd.com; kreyes@blc-sd.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **Roye Zur** rzur@elkinskalt.com, lwageman@elkinskalt.com; 1648609420@filings.docketbird.com; rzur@ecf.courtdrive.com

**2. SERVED BY UNITED STATES MAIL:**

United States Trustee 411 W. Fourth St., Suite 7160 Santa Ana, CA 92701-4500	Bank of the Sierra Elliott Miller P.O. Box 1930 Porterville, CA 93258	JP Morgan Chase Bank, N.A. P.O. Box 6026 IL1-1145 Chicago, IL 60680
Ronnie Jordan c/o Kenneth J. Catanzarite 2331 West Lincoln Avenue Anaheim, CA 92801	PNC Bank 201 E. Pine St., Suite 100 Orlando, FL 32801	American Express PO Box 96001 Los Angeles, CA 90096
Gloria Mowbray Property Trust 960 Sunset Hill Ln. Redlands, CA 92373	Banner Bank HELOC 368 East Vanderbilt Way San Bernardino, CA 90240	Capital One P.O. Box 60519 City of Industry, CA 91716
Concura Credit P.O. Box 96541 Charlotte, NE 28296	Target P.O. Box 660170 Dallas, TX 75266	Saks First P.O. Box 182436 Columbus, OH 43218
Synchrony Bank P.O. Box 71724 Philadelphia, PA 19176	Visa Platinum 1425 Lugonia Ave Redlands, CA 92374	Best Buy P.O. Box 790441 St. Louis, MO 63179
Macy's American Express P.O. Box 9001108 Louisville, KY 40290	Lane Bryant P.O. Box 650972 Dallas TX 75265	